

# LUKAS, NACE, GUTIERREZ & SACHS

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February 25, 2008

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

Re: **EB Docket No. 06-36**  
**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007**

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith, on behalf of Edge Wireless, LLC, the carrier's 2007 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Todd Slamowitz

Enclosures

cc: Enforcement Bureau, FCC (2)  
Best Copy and Printing, Inc. (1)

February 21, 2008

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

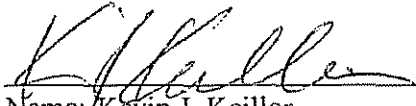
Re: **Annual 47 C.F.R. § 64.2009(c) CPNI Certification for 2007**  
**EB Docket No. 06-36**

Carrier: Edge Wireless, LLC  
Form 499 Filer ID: 821084

CERTIFICATION

I, Kevin J. Keillor, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the rules.

  
Name: Kevin J. Keillor  
Title: General Counsel and Secretary  
Date: 2/21/08

Company Name ("Carrier"): Edge Wireless, LLC

Address: 650 SW Columbia, Suite 7200  
Bend, OR 97702

### STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

Edge Wireless does not sell, rent or otherwise disclose customers' CPNI to other entities. Further, Edge does not currently use, nor allow its affiliates to use, any customers' CPNI in marketing activities except to the extent such use is permitted without customer consent. Nonetheless, Edge Wireless has implemented the following measures to safeguard customer privacy and CPNI:

- All employees receive training from the Legal Department regarding privacy requirements under state and federal law including CPNI.
- All employees receive training on our authentication process to ensure only the account holder and authorized users have access to account information including CPNI. Edge Wireless only provides account information including CPNI to the account holder or another party authorized by the account holder in writing, except in response to legal process.
- Employees are prohibited from sending account information including CPNI outside of the company by email or fax. Account information may only be mailed to the billing address of record for the account or provided to the account holder or authorized user in our stores after their identity has been properly verified.
- Supervisors and managers receive annual training which includes updates on customer privacy issues and compliance.
- Employees who violate company policy concerning customer privacy and CPNI are subject to discipline.
- Carrier took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: None

- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: None
  
- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: Three
  
  - Category of complaint:
    - Number of instances of improper access by employees
  
    - 3   Number of instances of improper disclosure to individuals not authorized to receive the information
  
    - Number of instances of improper access to online information by individuals not authorized to view the information
  
    - Number of other instances of improper access or disclosure
  
  - Description of instances of customer complaints, improper access or disclosure:

August 2007

Harbor, OR - Sales management received a complaint from a customer that information from his account with Edge Wireless had been provided to another individual by an employee in the retail store in Harbor, Oregon. Sales management and HR investigated the complaint and concluded that the employee indicated had not provided any inappropriate information related to this matter.

Ukiah, CA – Customer Care received a complaint from a customer that a retail sales representative in Ukiah, CA had provided call records to another individual. Sales management and HR investigated the complaint. Within a week of the initial complaint the customer called back and spoke with a supervisor in Customer Care and said that he had been mistaken so the investigation was concluded.

September 2007

Harbor, OR – Sales management received a complaint from a customer that a retail sales representative in the Harbor, OR retail store had provided account information to another individual. Shortly following this interaction the customer contacted sales management again and said it was a mistake, and that the information was not provided by an employee of Edge Wireless.